

HOMEOWNER OCCUPIED REHAB (HMR) PROGRAM GUIDELINES

Program Guidelines are a requirement for Michigan State Housing Development Authority's (MSHDA) Neighborhood Development Division (NDD) programs. They are used by NDD subrecipients as an outline of program offerings, program and compliance requirements, eligibility requirements, selection criteria, complaint procedures, and program processes. They are intended to inform potential participants of the program's rules, expectations, and requirements.

Ultimately, Program Guidelines protect the subrecipient from claims of discrimination, favoritism, or other unfair treatment. Program Guidelines should spell out in plain terms the substantive requirements of the program, so that if an applicant is denied, the reason is clearly supported by written rules of the program. Program Guidelines should also be directed at potential participants of the Community Development Block Grant (CDBG) Homeowner Occupied Rehab (HMR) program.

Subrecipients will have individual written program guidelines (approved by MSHDA) to meet their service area need which will establish the following:

1. CDBG Program Goals
2. Selection of Service Area
3. Leveraged Resources
4. Owner Contribution (if applicable)
5. Fair Housing/Equal Employment Opportunity/Non-Discrimination
6. Conflict of Interest Statement & Fraud
7. Complaint Resolution Process
8. Eligible Recipients
9. Eligible Properties
10. Minimum/Maximum Levels of Assistance
11. Historical Property – Local Historic Review (if applicable)
12. Lead-Based Paint/Asbestos Compliance (if applicable)
13. Eligible Activities
14. Household Applicant Intake and Selection Process
15. Contractor Selection Process and Criteria
16. Lien Requirements (for non-MSHDA funds, if applicable)
17. Program Administration/Third Party Administration
18. Developer Agreement
19. Monitoring

Refer to the CDBG Terms Sheet for further details, all Subrecipient Program Guidelines are subject to MSHDA approval. Place the Program Guidelines on your letterhead, insert appropriate information for all red font, identify any additions or modifications that were made as an attachment, submit to your CDBG Specialist for review and approval prior to moving forward.

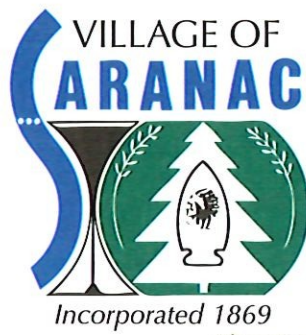
I certify and acknowledge that all items identified above will be carried out in a compliant manner.

Date 4/1/26

X Sharon L. Darby
VILLAGE OF SARANAC

Date 4/1/26

X Christopher Lussier
MSHDA APPROVAL, CDBG Manager



VILLAGE OF SARANAC

PROGRAM GUIDELINES

FOR

HOMEOWNER OCCUPIED REHAB (HMR) PROGRAM

VILLAGE OF SARANAC

**Community Development Block Grant (CDBG)
Homeowner Occupied Rehab (HMR) Program**

**27 N Bridge Street
PO Box 312
Saranac, MI 48881
Phone: 616.642.6324**

The UGLG agrees to adopt CDBG Program Policy Manual as their Program Guidelines to follow, adhere to, with respect to all policy, procedure, compliance, reporting for this CDBG Program.

INTRODUCTION

These policies have been adopted by the VILLAGE OF SARANAC (UGLG) to administer MSHDA’s CDBG HOMEOWNER REHABILITATION (HMR) PROGRAM including Homeowner Occupied Rehab (HMR) Program activities. Amendments to these Program Guidelines must be approved by MSHDA prior to a majority vote of the UGLG Board.

EXPENSE ALLOCATION

| CDBG PROGRAM ACTIVITIES | CDBG FUNDS | TOTAL |
|--|--------------------|--------------------|
| Homeowner Occupied Rehab (HMR) Program | \$1,230,000 | \$1,230,000 |
| Administration (up to 18%) | \$270,000 | \$270,000 |
| Leverage Funds | \$0.00 | \$0.00 |
| Leverage Funds | \$0.00 | \$0.00 |
| TOTALS | \$1,500,000 | \$1,500,000 |

Program Funds: Loan repayments/recaptured funds from all CDBG State programs must be treated as program income and must be spent throughout the duration of the program on the same activities as stated in present and prior grant applications. Administration funds up to 18% may be utilized to help defray the cost of administering the CDBG Program.

Program Area: The CDBG Program is offered (mapped area) with boundaries identified and will assist eligible homeowners.

Household Income Restrictions:

The following documentation of program benefit is required for all CDBG-funded activities that are carried out under the LMI Housing National Objective. Additional back-up documentation must be kept on file.

1. For each assisted unit, the family size and income ranges (30%, 50%, 80%) of occupant households, and the amount of CDBG funds spent on the project.
2. Documentation that the housing is occupied by LMI households are affordable.
3. Data on the racial, ethnic and gender characteristics of persons who are applicants for, participants in, and/or beneficiaries of CDBG activities. Grantees are required to report income and demographic information for the individuals living in the house.

CDBG Income Limits are determined by HUD each year in a very large excel document for all counties in the United States. For convenience and ease, please refer to CDBG Income Limits (10-N) which will be updated when new limits are provided by HUD.

GENERAL PROVISIONS

Purpose of the CDBG Program: This program is intended to provide funds for the following:

Homeowner Occupied Rehab (HMR) Program: Rehabilitation and improvement of owner occupied, single family residential units. All HMR repairs must conform to the CDBG Policy Manual Construction Standards, Michigan International Builders Code, Michigan Electrical Code, the UGLG Construction Rehabilitation Standard, and comply with local zoning regulations and ordinances. The HMR Project workbook and proforma will be used for each activity. HMR will enable CDBG funds to assist single-family Housing Rehabilitation Repairs to be brought up to MSHDA's rehabilitation standards and BOCA property maintenance code. The HMR major emphasis is serving the UGLG's residents by upgrading the homes owned by low to moderate income households which must be at or below 80% area median income. For further information refer to the HMR QUICKFINDER.

THIRD PARTY ADMINISTRATOR SERVICES

The applicant may indicate on the application a Third-Party administrator (TPA) with whom it will contract for Grant implementation. If a TPA is proposed: 1) the procurement process outlined in the CDBG policy manual must be followed, and 2) the Grant Management Plan identifying the individuals to be responsible for various roles and responsibilities of grant implementation must be completed, and 3) CDBG must receive a copy of the administrative agreement (Contract) between the applicant and TPA.

Grantee's Authorized Official must execute and submit a completed Grant Management Plan and all required attachments for MSHDA CDBG review and approval.

All documentation referenced above must be received as a pre-disbursement condition to the Grant Agreement.

TIERED ENVIRONMENTAL REVIEW

HMR projects will use the Tiered Environmental Review when not all project sites have been identified.

Tier I Environmental Review deals with the projects overall broad target area.

Tier II Environmental Reviews are site-specific reviews completed on each individual property as it is identified (after publication and prior to commitment of funds), to the project site. Used for HMR activities (Categorically Excluded Subject to 58.6 (CEST)).

For information on the Environmental Review process review Chapter 7 of the Policy Manual.

APPLICANTS

APPLICANT CRITERIA/SINGLE FAMILY HOUSING

Housing Rehabilitation assistance will be made to all eligible homeowners residing within the UGLG's targeted area who meet the eligibility requirements. The HMR improvements are listed in the policy manual but are not limited to the list in the policy manual. Please contact CDBG Program staff for guidance for items not listed.

HMR APPLICANT REQUIREMENTS

Applicant must be an individual, or family, who has ownership by warranty deed and occupies a single-family dwelling residential property or is purchasing property under a mortgage. The warranty deed or mortgage must be recorded in the County Register of Deeds office. Properties with a Reverse Mortgage are not eligible for assistance.

Applicant's home must be at least 5 years old, and Applicant must have occupied the home for 1 year prior to making application. Applicant must reside in the premises for the term of the loan.

Applicant, and all other joint owners of the property, must agree to sign a mortgage and note for the total amount of the loan, including all related costs of the loan.

Applicant will be required to maintain loss payable insurance on the property for the duration of the terms of the loan and provide proof annually. The UGLG will be placed on the insurance policy as lien holder if the project is approved.

It will be the option of the UGLG to require either loss payable insurance or replacement coverage on the applicant's home. The type of insurance will depend on the amount of assistance. Any type of coverage will still require that the UGLG be placed on the insurance policy as lien holder.

Applicant will be required to keep the property tax payments current for the duration of the loan term and provide proof annually.

Upon termination of ownership, whether by death, sale of property or title transfer, the balance of the mortgage must be paid in full.

Note: If the home is deeded to another family member upon applicant's death, that person's income shall be verified and if he/she qualifies, payment will be determined by the UGLG. If income is too high, this person shall be required to pay off the loan in full.

Applicants approved for a Homeowner Occupied Rehab (HMR) loan may not apply for another HMR loan if their MSHDA grants/loans combined are over \$75,000 for a period of 5 years. This does include Emergency Repair program income projects.

Conflict of Interest:

The UGLG cannot provide assistance to an employee, an employee's immediate family member, or any individual associated with the CDBG program. Exceptions may be possible, on a case-by-case basis if a Conflict of Interest Disclosure is submitted outlining why participation is warranted, and MSHDA legal approves the disclosure request. See CDBG Policy Manual, Chapter 1 Program Overview, Conflict of Interest Regulations section. They may apply for other programs through the Michigan State Housing Development Authority.

Applicant Package:

The Program Administrator shall be responsible for establishing a permanent file for all approved applications and ensuring that all necessary documents are included in the applicant's permanent file. The Program Administrator shall provide the necessary forms to all applicants who, after preliminary screening for eligibility, appear to be qualified for rehabilitation assistance. Applicants for rehabilitation assistance shall furnish the required documents in the HMR Project Workbook. They may need to provide other documents required by the Administrator. An application shall be considered "received" only after all required applicant documents are received in the Program office. At that time, they shall be "date and time stamped" in order received. Applicants will be served on a first-come, first-served basis. A member of the UGLG staff will interview the applicant to ensure the applicant is aware of the program scope and the requirement of a mortgage being placed on the property to secure the deferred loan. If the applicant decided not to proceed, they will indicate in writing. This will be documented as a closed file.

Benefit to Low- and Moderate-Income Residents:

The Housing and Community Development Act of 1974 requires low- and moderate-income persons be eligible in making a rehabilitation deferred loan or local loan on residential property. Low and moderate is interpreted to mean persons whose income is less than 80% of the median income for UGLG residents as reported by State of Michigan for non-metropolitan areas. The income guidelines adopted by the UGLG are in accordance with the CDBG Income Limit Guidelines as established by the Department of Housing and Urban Development.

The following documentation of program benefit is required for all CDBG-funded activities that are carried out under the LMI Housing National Objective. Additional back-up documentation must be kept on file.

1. For each assisted unit, the family size and income ranges (30%, 50%, 80%) of occupant households, and the amount of CDBG funds spent on the project.
2. Documentation that the housing is occupied by LMI households are affordable. For convenience and ease, please refer to CDBG Income Limits (10-N) which will be updated when new limits are provided by HUD.
3. Data on the racial, ethnic and gender characteristics of persons who are applicants for, participants in, and/or beneficiaries of CDBG activities. Grantees are required to report income and demographic information for the individuals living in the house.
4. To be eligible for our programs, an applicant's income must not exceed current Income Limits as set forth by HUD. The following two income methods are used to calculate the gross income projected over the next 12 months for all adult household members IRS Form 1040 Long Form Method and Part 5 Annual Income. For all CDBG activities, Grantees will calculate annual income as defined in 24 CFR 5.609, also refer to as Part 5 Annual Income, and is used to determine program eligibility and to calculate subsidy. Please refer to Policy Manual Chapter 10 Income Verification for more information.

Eligible Properties:

The Michigan State Historic Preservation Office (SHPO) will be notified of all potential projects in which the property is 50 years of age or older. For properties listed on or eligible for the National Register of Historic Places, activities associated with conforming repair and rehabilitation activities to the standards and/or design comments resulting from the consultation process contained with SHPO.

Necessary repairs to manufactured homes.

- The recipient owns the home and the site on which the home is situated, and has occupied that home on that site for at least one year prior to receiving assistance; and
 - The manufactured home is on a permanent foundation or will be put on a permanent foundation with these funds.
- A. Funds may be used for payment of incidental expenses directly related to accomplishing authorized activities such as fees for connection of utilities (water, sewer, gas, electric), credit reports, surveys, title clearance, loan closing, inspections, and architectural and other technical services. All fees will be in accordance with local prevailing rates and so documented.
- B. Funds may not be used to:
1. Refinance any debt or obligation of the homeowner other than obligations incurred for eligible items covered by this section entered into after date of agreement with grantee.
 2. Repair or rehabilitate any property located in the Coastal Barrier Resources System as designated by the Coastal Barrier Resource Act.
 3. Expanding structures, or completing unfinished spaces, if not required by code.
 4. Materials, fixtures, grading, or filling of a type of quality which exceeds what customarily is used in the locality for properties of the same general type as the property to be rehabilitated.
 5. Appliances, such as dishwashers, washing machines and clothes dryers.
 6. Penalties or special assessments which are a requirement of the homeowner.

7. Furnishings, such as items of furniture, drapes, and appliances that are not required by housing code.

C. Administration Costs.

1. Payment of reasonable salaries or contract for professional, technical, and clerical staff actively assisting in the delivery of the Homeowner Occupied Rehab Program.
2. Payment of necessary and reasonable office expenses such as office rental, supplies, utilities, telephone services and equipment. (Any item of non-expendable personal property having a unit value of \$1,000 or more, acquired with federal funds will be specifically identified to the grantor in writing. An itemized list of all equipment purchased with CDBG funds will be kept on file and will include date of purchase, serial # and description. This file will be made available upon request. Equipment purchases over 5 years old (date of purchase) will be deleted from this list and will become the property of the UGLG.
3. Payment of necessary and reasonable administrative costs such as worker's compensation, liability insurance, and the employer's share of Social Security and health benefits. Payments to private retirement funds are permitted if the grantee already has such a fund established and ongoing.
4. Payment of reasonable fees for training of grantee personnel.
5. Payment of necessary and reasonable costs for an audit upon expiration of the grant agreement.
6. Other reasonable travel and miscellaneous expenses necessary to accomplish the objectives of the specific grant which were anticipated in the individual grant proposal, and which have been approved as eligible expenses at the time of grant approval.

D. Administration funds may not be used for:

1. Preparing housing development plans and strategies except as necessary to accomplish the specific objectives of the Homeowner Occupied Rehab Program.
2. Substitution of any financial support previously provided or currently available from any other source.
3. Buying property of any kind from families receiving assistance from the grantee under the terms of the program.
4. Paying for or reimbursing the grantee for any expense or debts incurred before the grantor executes the grant agreement.
5. Paying any debts, expenses, or costs, which should be the responsibility of the individual families receiving CDBG assistance outside the cost of repairs, rehabilitation, or replacement.
6. Any type of political activities prohibited.
7. Other costs including contributions and donations, entertainment, fines and penalties, interest, and other financial costs unrelated to the assistance to homeowners, legislative expenses, and any excess of costs from other grant agreements.

CONTRACTOR REQUIREMENTS

1. The CDBG Policy Manual contractor requirements must be met. Eligible contractors must be licensed contractors residing in and their principal place of business is in the UGLG's County. If a suitable number of local contractors do not participate, out of county contractors can be utilized. Minority, female, and disadvantaged business contractors are encouraged to bid on projects. See MSHDA MBE WBE Database, listed under EEO at <https://www.michigan.gov/mshda/developers/architects-and-contractors>.
2. Contractor will provide all materials, equipment, and labor necessary to perform the work stated in the Bid Specification. All materials and workmanship must meet minimum standards as set forth in the UGLG's Construction Rehabilitation Standard book, BOCA Basic National Property Maintenance Code, and Michigan Energy Code. All materials used are to be new materials unless otherwise stipulated in the specifications.
3. Contractor will be responsible for obtaining any required work permits and arranging for subsequent permit inspections.
4. Contractor will conform to all applicable local codes and ordinances whether or not specifically stated in the Specifications.
5. Contractor will furnish evidence of Comprehensive Public Liability Insurance (\$300,000) protecting the Homeowner in the event of bodily injury, including death, and (\$100,000) in the event of property damage arising out of the work performed by the contractor or a sub-contractor.
6. Contractor will furnish evidence of Worker's Compensation Insurance when applicable and any other coverage required by Michigan Statutes. Statement of Sole Proprietorship will be required from contractors operating as such.
7. Bids and contracts must contain contractor and sub-contractors performing work on each job. UGLG must confirm the Contractor and sub-contractors working on the project are not listed on the [HUD Limited Denial of Participation List](#) and the Contractor will need to have an [Unique Entity Identifier number](#) (previously SAM and DUNS) with no exclusion.
8. Contractor must sign the contractual agreement with the Homeowner, as prepared and approved by the UGLG.
9. Contractor will be required to begin work within 10 calendar days from receipt of the "Proceed to Work Order" or show just cause for not beginning work.
10. Contractor shall disqualify his bid by specifying material not otherwise specified in bid specifications. Contractor must bid each numbered item and show lump sum of all items.
11. The program will limit all projects to \$25,000 and presume lead. For homes that were constructed pre-1978, where the project will disturb paint surfaces, workers will be RRP (Renovation, Repair and Painting) certified.

General Asbestos Policy. All construction, demolition, and rehabilitation that is done in whole or in part with CDBG funds must comply with state and federal asbestos removal requirements. Only EPA asbestos certified specialists, or other workers along with a supervisor, can carry out asbestos abatement tasks. Asbestos activities must be associated with an approved rehabilitation activity. It is the responsibility of the grantee, developers, owners, and contractors to know and comply with local, state, and federal construction standards. See Asbestos Applicability Worksheet.

12. If the contractor is unable to complete his work due to conditions within his control, the contractor will pay for additional inspection plus twice the amount of the item not completed will be withheld from the balance until final inspection and final payment.

13. Each contractor will be responsible for all landscaping that is damaged during work being performed. If landscaping is found damaged on final inspection all remaining monies will be withheld until the damage is repaired to original condition.
14. The contractor may be removed from bidding if failing to respond to the invitation to bid for a period of 6 months.
15. Once removed from bidding, for poor workmanship, the contractor may request re-instatement from the UGLG.

HMR INSPECTION

1. The initial inspection will be conducted by the designated inspector for the UGLG to determine building code issue areas needing to be addressed.
2. The program will limit all projects to \$25,000 and presume lead. For homes that were constructed pre-1978, where the project will disturb paint surfaces, workers will be RRP (Renovation, Repair and Painting) certified.
3. Radon testing must be completed for rehabilitation and documented for the environmental review.
4. The inspector may be requested by the Director to conduct a special inspection either prior to homeowner's acceptance of the prepared specifications or, if conditions warrant such, during actual construction.
5. The final inspection made by the inspector is conducted after receipt of the Work Completion Statement to determine contractor's compliance with work specifications.
6. Contractors must arrange with local code officials for inspections and final approval on any building, electric, plumbing and/or mechanical permits required.
7. Any inspection fee charges and cost incurred from code rehabilitation and emergency repair projects by the Housing Inspector will be charged against the Administration or Project Processing Fee budget category as follows:
8. Initial Inspection (includes mileage, walk through inspection report and cost estimate). TBD, currently conducting RFP for TPA services.
9. Bid Specification/Final Cost Estimate (includes preparation of bid specifications, final cost estimates, and mileage). Bid specification shall be itemized per item plus cost breakdown. TBD, currently conducting RFP for TPA services.
10. Other inspections (includes mileage and signed inspection forms for half-way rough-in, special and final inspections). TBD, currently conducting RFP for TPA services.
11. All the inspection fee charges, and cost incurred from code rehabilitation projects by the Home Improvement Inspector will be charged against the Administration or Project Processing Fee budget category.

HMR BID SPECIFICATIONS

The UGLG may use MSHDA's Construction Rehabilitation Standard (in the CDBG Policy Manual), listing items that are to be considered on bids. These UGLG Construction Rehabilitation Standard book will be given to all interested licensed Contractors. This specification book has been prepared by the UGLG Code Enforcement Officials.

The Homeowner must sign the "Approval of Bid Specifications" form. The homeowner is advised to question any items which are unclear and inform the UGLG of any additional work to be done (if eligible) before project is let for bids.

HMR BIDS

1. Bid package will be prepared and mailed, emailed, or solicited via the Michigan SIGMA website to licensed and insured contractors requesting work.
2. The homeowner and the director will go over the bids. The homeowner will voice his/her choice of contractor. The homeowner will be reminded that it is the general practice to accept the lowest responsible bid (within 10% of the inspector's estimate). If the owner chooses the higher bid, he/she must pay the difference between the lowest responsible bid and the chosen, higher bid. This difference must be paid prior to the start of any work. The director will present bids to the UGLG or Housing Bid Committee at the regular board meeting, (the director may choose to call a special bid committee meeting) and they will be informed of the homeowner's preference. The UGLG or Housing Bid Committee will be given the opportunity for the final approval.
3. The homeowner is notified of the bid award. Upon the homeowner's acceptance, the contractor is notified of the bid award. If the low bidder was not selected due to a choice by the homeowner, the low bidder will be notified of this in writing.
4. The UGLG Board of Commissioners or Housing Bid Committee reserves the right to reject all bids in excess of 10% of the Inspector's estimate (when applicable), upon receipt of a single bid, or when the bids appear to be out of line.
5. To prevent unnecessary change orders and cost over-runs on projects, contractors will be asked to bid projects on an item-by-item basis. This will enable the Housing Department to keep project costs under control.
6. If the selected contractor is not currently listed on the UGLG's contractor list, he/she will be required to submit the necessary information prior to signing contract.
7. Typically, 3 or more bids will be required, however if only one bid is received the homeowner and/or UGLG or Housing Bid Committee members have the option to accept that bid if it is within 10% of the housing inspector's estimate or may elect to rebid the project.
8. Contingency Funds providing for contingencies must be related to construction activities. A contingency must be identified in the specific budget line item for which it is intended and must be reasonable in amount (no more than 20%).

Homeowner Occupied Rehab Project (HMR) Mortgage: Homeowner Improvement Project assistance of \$10,000 or less will be a grant to the homeowner with no repayment, mortgage or mortgage note required. CDBG assistance of \$10,001 or more shall be a zero interest, zero payment loan, forgivable after 5 years. Loans shall be secured by a second mortgage, forgiven in full at the end of 5 years. Other loan characteristics: Mortgage shall include the full amount of assistance. Mortgage and Mortgage Note are between homeowner and MSHDA. Due on default, sale, refinance, or transfer, if no longer occupied by borrower, or upon default of any other terms set forth in the mortgage and/or note.

HMR WORK PERFORMANCE

1. Contractor will begin work within 10 days of contract signing and issuance of the "Proceed to Work Order".
2. Homeowner will notify the UGLG of the date work is started. This date will be documented in the applicant's file.
3. Contractor will notify the UGLG of any problems occurring during the performance of work.
4. All necessary work change orders more than 10% of the project cost will be approved by a committee consisting of the UGLG. They will be issued by the UGLG and signed by both the contractor and the homeowner. Any work change order in excess of 10% of the project cost will be reviewed by the full UGLG acted upon by the full UGLG board at the next regular meeting.

5. Lien Protection Procedure. Using the proper Lien Procedure protects the homeowners, workers, suppliers, contractors, builders, and grantees. Using the proper Lien Forms and timeline submittals will provide full lien protection.

HMR PAYMENTS TO CONTRACTOR

1. UGLG may disburse up to 40% of the total contract amount, if less than 40% of the approved improvements are complete with proper documentation provided by contractor.
2. UGLG may disburse up to 70% of the total contract amount, if at least 70% of the approved improvements are complete with proper documentation provided by contractor.
3. UGLG may disburse up to 95% of the total contract amount, if at least 100% of the approved improvements are complete. UGLG will notify Housing Inspector to conduct final inspection.
 - a. Inspector will set appointment with homeowner and contractor.
 - b. Inspector will ensure that all items on the work specifications were completed satisfactorily.
 - c. Inspector will give signed reports to the UGLG.
4. Upon receipt of project acceptance by Homeowner and Inspector, and final inspections of permits by local code officials:
 - a. Contractor is entitled to a 95% disbursement of the contract amount, provided he has supplied waiver of lien forms signed by all sub-contractors and has signed the Contractor's Final Invoice Release of Claims & Warranty.
 - b. The final 5% of a project's contract amount will be released 7 days following final acceptance of the completed work.
5. The UGLG is authorized to prepare draws to the contractor determined upon work progress inspections.

HMR COMPLAINT POLICY

The complaint policy is in the grant policy manual and the UGLG's policy must contain the following:

- Review Committee
- Procedures
- Filing Complaints
- Response
- Dispute Resolution
- Final Recourse
- Reinstatement

FAIR HOUSING & EQUAL OPPORTUNITY PROCEDURE

UGLG complies with MSHDA's CDBG program's policy manual for Fair Housing and Equal Opportunity requirements. In compliance with Fair Housing requirements, UGLG will maintain a Fair Housing Log which discloses information regarding any and all fair housing concerns and their outcomes, as well as Affirmative Fair Housing actions taken to further fair housing.

Persons wishing to file a housing related complaint or concern will be referred to the Michigan Department of Civil Rights, HUD, and the Fair Housing Center in Michigan. Persons wishing to file a complaint or concern that is employment related will be referred to the Equal Employment Opportunity Commission and the Michigan Department of Civil Rights.

UGLG will notify MSHDA if a complaint or concern is filed.

UGLG PROGRAM ADMINISTRATION

The UGLG is responsible for the HMR Workbook completion and submission of all required program documents including those set forth in the following:

- Step 1 Applicant Eligibility
- Step 2 Property Evaluation
- Step 3 Selection of Contractor
- Step 4 Closing and Lien Documents
- Step 5 Construction Management
- Step 6 Project Closeout

Additionally, UGLG is responsible for the oversight of all MSHDA CDBG program-required activities on its online grant management systems including timely submission of Financial Status Reports (FSRs), Progress Reports and Project Completion Reports.

HMR PAYMENT OF EXPENDITURES

Grant recipients under the CDBG Program are required to comply with the grant administration and financial management guidelines set forth in 2 CFR part 200, Uniform Administrative Requirements for Grants in Aid to State.

UGLG PAYMENT PROCESS

1. Vouchers to institute payment of bills will be prepared by the UGLG staff for approval. Once approved for payment, vouchers will be signed by the UGLG staff.
2. The UGLG staff will issue checks for payment. To ensure a proper register of checks, these checks will be UGLG staff checks and not those of the UGLG's General Fund. The checks will be signed by the Treasurer and a Deputy Treasurer or any other authorized person to sign county disbursement checks.
3. The UGLG staff appointed by the UGLG Board will be responsible for proper maintenance of books of account.
4. The UGLG staff will be responsible for preparing Grant Payment Requests and Status of Funds Reports.
5. Monthly financial reports will be prepared by the UGLG staff on the administration and rehabilitation accounts. These reports will show the following:
 - a. Program Budget
 - b. Actual Expenses for the Month
 - c. Year to Date Expenses
 - d. Current Cash Balance
 - e. Balance of Unexpended Program Budget
6. All other accounting functions will be the responsibility of the UGLG staff.

HMR MARKETING PLAN

The purpose of this plan is to describe how the community will promote the CDBG housing programs and how the program information will reach eligible participants.

Market Identification. UGLG Demographic Information.

Marketing Goal. For purpose of this application, it is the goal of the UGLG to reach a minimum of # households with a variety of information regarding housing assistance.

Marketing Methods

1. UGLG will do a news release when funding announcements are made.
2. Program notices are sent to local service clubs and organizations such as Department of Health and Human Services and United Way.
3. Several times during the program, classified ads are placed in local newspapers.
4. Public Service announcements are placed on radio and TV as necessary in order to reach those hearing and visually impaired individuals who may qualify for the program.
5. Posters and fliers are distributed around UGLG in opportune places such as supermarkets, banks, laundromats, drug stores and distributed at meetings, if applicable.
6. The program director will appear upon request, at local governmental meetings and organizational meetings to discuss the CDBG Program.

Marketing Budget \$1,000

GRANT MONITORING

The Neighborhood Development Division (NDD) is responsible for ensuring that funds are committed and expended in accordance with the program requirements of NDD's funding sources -- MSHDA CDBG grants, Monitoring Plan identifies monitoring objectives, ongoing monitoring procedures, and criteria for on-site monitoring of program participants. This annual monitoring plan serves as a strategy for determining compliance as well as guidance for NDD housing staff. More information can be found in the CDBG Policy Manual.